

**To: ORI MARTIN'S CUSTOMER**

To the attention of:      Quality Manager  
   Safety & Environment Manager  
   REACH Manager

**Subject: Declaration of compliance with Regulation (EC) No 1907/2006 "REACH".**

In relation to the provisions of Regulation (EC) No. 1907/2006, and subsequent amendments and supplements, concerning the registration, evaluation, authorisation and restriction of chemicals, hereinafter the "REACH" Regulation, we hereby highlight the following points:

**1) Classification of Our Products**

According to the definitions of the REACH Regulation (substance, mixture or article), the products we supply (billets, coils and steel bars) are considered ARTICLES without intentional release of substances, for which registration is not required under art. 7.

**2) Fulfilments of ORI MARTIN S.p.A.**

The REACH Regulation does not require the registration of substances recovered from scrap metal if the same comes from EU countries or is purchased from non-EU countries as waste. Considering that all the scrap metal we use falls into these categories, we have not had to proceed with any registration (**exemption provided for by art. 2 par. 7 letter d of Regulation (EC) no. 1907/2006**).

**3) Compliance of our suppliers (supply chain)**

The other raw materials used during our production process (e.g. ferroalloys, cast iron) are purchased from manufacturers or importers with registered offices within the European Union. We have requested from them a Declaration of Conformity according to the REACH Regulation as suppliers of substances/mixtures.

**4) Restrictions on the use of certain substances (Annex XVII)**

The products manufactured by ORI MARTIN S.p.A., except as reported in Note 1 (conditions for restriction), do not fall under the regime of restriction of use provided by art. 67 and the list in Annex XVII of REACH Regulation.

Note 1: Nickel (Restriction No 27) - Nickel (Ni) alloy steels (EINECS 231-111-4) should not be used for the uses listed in Annex XVII (e.g. manufacture of metal objects/articles intended to come into direct and prolonged contact with the skin such as earrings, bracelets, etc.).



## 5) Substances of Very High Concern "SVHC"

Substances meeting the criteria in Article 57, identified in accordance with Article 59 of the REACH Regulation are "substances of very high concern" known as SVHC (Substances of Very High Concern). Considering that:

- according to the declarations received from our suppliers, these substances have not been intentionally added to the substances/mixtures purchased by us;
- they are not intentionally added by us in the production process;
- traces are present in concentrations not exceeding 0.1% w/w;

Ori Martin S.p.a. declares that in its articles there are **no substances of very high concern (SVHC)** included in the updated list of candidate substances for inclusion in Annex XIV in concentrations above 0.1% w/w.

Consequently, the following do not apply

- the downstream communication obligation (Art. 33 paragraph 1);
- the obligation to notify the ECHA (art. 7 paragraph 2 letter b) under the REACH Regulation.

Also the obligation to **notify** to the **SCIP** (Substances of Concern In Products) database of ECHA (extension of art. 33 paragraph 1 REACH and D. Decree No. 116/2020 art. 7 paragraph 2 letter b) of the REACH regulation. Legislative Decree no. 116/2020 art. 180 paragraph 3), **for suppliers of articles** that contain at least one "SVHC in Candidate List" in a concentration above 0.1% w/w, is not applicable.

The safety data sheet of our products shows the presence of traces of some SVHC in concentration not higher than 0.01% w/w to which the above mentioned obligations are not applicable.

Updates on the inclusion of substances in the Candidate list of SVHC or changes received from Our suppliers or concerning Our products will be promptly communicated by Us.

The above statement applies to substances listed on the Candidate List of SVHC as published to date on the ECHA website ([www.echa.europa.eu](http://www.echa.europa.eu)).

We remain at your disposal for further information and would like to take this opportunity to express our sincere appreciation to you.

ORI MARTIN S.p.A.



**Sig. Andrea Bonomi**  
RSPP